



FEDERAL
STUDENT AID

We Help Put America Through School

Privacy Impact Assessment Training

E-Government Act At FSA

August 26, 2003

"We help put America through school"



Today's Training Topics

1. E-Government Act of 2002 Overview
2. E-Gov Act Section 208 impact to FSA
3. Privacy Impact Assessment in the Solution Lifecycle (System Security Process Guide)
4. FSA's Available Resources
5. Action Items



E-Gov Act Overview

In November 2002, Congress passed the E- Government Act of 2002. The high-level purposes of the Act include:

- Provide effective leadership of E-Gov efforts by establishing an Administrator of new Office of Electronic Government in OMB.
- Promote Internet usage to increase Government/Citizen interaction.
- Promote interagency collaboration in providing E-Gov services.
- Promote access to high quality government info and services across multiple channels.
- Make Federal Government more transparent and accountable.



E-Gov Section 208 impact to FSA

Section 208 of the E-Gov Act requires Agency's systems to perform the following two activities:

1. Perform Privacy Impact Assessments
2. Post Privacy Notice Links on Websites and/or post a notice in the Federal Register



Privacy Impact Assessment Overview

SSO's and their support team must:

- Perform a privacy impact assessment questionnaire before developing, procuring or changing an information technology system that collects, maintains, or disseminates information that is in an identifiable form; or initiating a new collection of information that—
 - will be collected, maintained, or disseminated using information technology;
 - includes any information in an identifiable form permitting the physical or online contacting of a specific individual.

Inventory Worksheet information will assist you in answering the questions for a PIA.



Privacy Impact Assessment Content

The PIA requires responses to specific questions. In lieu of specific implementation guidance from OMB, FSA requires its systems to answer the following questions articulated by Section 208.

1. What information will be collected for the system?
2. Why is the information being collected?
3. How will FSA use this information?
4. Will this information be shared with any other agency? If so, which agency(ies)?
5. Describe the notice or opportunities for consent that would be/ or are provided to individuals about what information is collected and how that information is shared with other organizations.
6. How will the information be secured?
7. Is a system of records being created or updated with the collection of this information?
8. List the web addresses (known or planned) that will have a Privacy Notice.



System Security Process Guide

Solution Lifecycle Security Checklist: Definition Phase

A Privacy Impact Assessment is created during the Definition Phase of the System Security Process Guide. For existing systems, we must retroactively comply with the E-Gov Act and perform an assessment.

Check if Complete	Name of Deliverable	Date Complete
<input type="checkbox"/>	System Roles and Responsibilities	
<input type="checkbox"/>	Critical Infrastructure Protection Survey	
<input type="checkbox"/>	GSS/MA Inventory Form	
<input type="checkbox"/>	System of Record Notice	
<input type="checkbox"/>	Privacy Impact Assessment	
<input type="checkbox"/>	Interconnected System'(s) Security Documentation	
<input type="checkbox"/>	MOU/SLA Draft	
<input type="checkbox"/>	C&A Project Plan	
<input type="checkbox"/>	System Rules of Behavior	
<input type="checkbox"/>	Constructed clearance requirement matrix	
<input type="checkbox"/>	Approved contractor access request form	
<input type="checkbox"/>	Draft Configuration Management Plan	



Privacy Notice Link for Websites

Privacy notice links must be posted on websites that collect personal information from the public. At a minimum the notice should contain the information identified in the PIA. The ed.gov website (<http://www.ed.gov/utilities/privacy.jsp>) contains a link to its security and privacy notice that provides additional language that may assist you create your privacy notice. Its categories are:

- Non-personal information we record
- Cookies
- Information from email you send to us
- Information collected from interactive forms
- Links to other sites
- Why we collect certain information
- Consequences for not providing all or part of the requested information
- Our authority to collect the information
- Systems of Records Notice link (if applicable)
- Contact information



FSA's Available Resources

FSA Security and Privacy has available for the SSO's:

- Privacy Impact Assessment Questionnaire template
- Guidelines for wording privacy notices on websites
- Copy of the E-Government Act



Action Items

- Review materials provided today and identify any questions or issues
- FSA Security and Privacy team will work with the Department to finalize an approach for implementing Section 208

Once the process is finalized...

- Complete a Privacy Impact Assessment for your system using the template
- Submit a PIA for your system to FSA Security and Privacy team by TBD 2003